

Procedures for Field Standardization of Local Health Department Trainers



Michigan Department of Agriculture
Food and Dairy Division
Food Service Sanitation Section
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Procedures for Field Standardization of Local Health Department Trainers

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Procedures for Field Standardization of Local Health Department Trainers

Chapter 1 – Introduction

Forward

Michigan local health departments, in partnership with the Michigan Department of Agriculture, are committed to the protection of the public's well being through education, regulatory enforcement, problem solving, leadership, and expertise related to food safety issues. The Food Service Sanitation Program's main goal is to eliminate the risk of foodborne illness from food served at licensed food service establishments. Two basic objectives form the foundation upon which the program standards are built:

1. Reduce the occurrence of the CDC identified risk factors that are known to cause foodborne illness and other factors that may contribute to foodborne illness; and
2. Establish a food service sanitation inspection framework within which the control of the risk factors are realized.

To accomplish this, MDA trainers, who have been standardized by FDA, will conduct the standardization process for local health department trainers. MDA will incorporate the FDA model using HACCP principles and risk based inspection procedures to focus upon the causes of foodborne illness, and will use traditional inspection techniques to assess overall sanitation. The standardization process has value in continuing a chain of knowledge and skills from the national level to the state and finally to the local health jurisdiction. It has the promise of providing a format for maintaining uniformity across the nation and within each state and local jurisdiction.

The 1999 Food Code

The introduction to the Food Code states, "It is a shared responsibility of the food industry and the government to ensure that food provided to the consumer is safe and does not become a vehicle in a disease outbreak or in the transmission of a communicable disease." The Food Code requires a person-in-charge at all hours of operation that performs duties and demonstrates knowledge in a number of technical food safety areas. Sanitarians must possess the knowledge and skills to perform competent inspections and to be able to communicate effectively with a knowledgeable industry.

Minimum Program Requirements

MDA is dedicated to the promotion of an effective food safety program. Minimum Program Requirement (MPR) H7 states:

"The program regulatory staff are trained with the skills and knowledge to a) during inspections, identify critical items (risk factors) that may contribute to foodborne illness; b) correctly interpret and apply regulatory requirements; c) communicate public health principles; d) promote and assist in development of risk control plans; and e) enforce the provisions of the laws."

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Local health department employees entering the food service sanitation program are required to train with a field trainer who has been standardized by MDA¹. The standardization process will encompass and emphasize the elements listed in MPR H7.

Role of the Standardized Field Trainer

Ideally, the standardized field trainer is the local health department's most qualified food service sanitarian. The field trainer is the in-house expert on all matters regarding the Michigan Food Law 2000, the 1999 Food Code, and the inspection process. In addition, the field trainer should have the desire, skills and ability to be a mentor, teacher, and leader, in order to inspire new employees and help them develop into competent food safety professionals.

Definitions

Candidate means an applicant who successfully meets the eligibility requirements.

Certificate means the document issued by MDA to candidates who successfully complete the standardization procedure.

Complex Full Service Operations: means a food service operation wherein multiple food processes are involved in the preparation of a food item. For example, food is stored, prepared, cooked, cooled, reheated, held hot, and served.

Critical Control Point (CCP): means a point or procedure in a specific food system where loss of control may result in an unacceptable health risk.

Food Code Interventions means the following set of preventative measures first introduced in the 1993 Food Code:

1. Demonstration of knowledge
1. Employee health
2. Hands as a vehicle of contamination
3. Time – Temperature relationships
4. Consumer Advisory

HACCP means Hazard Analysis Critical Control Point.

HACCP Principles mean the 7 principles of the HACCP system adopted by the National Advisory Committee on Microbiological Criteria for Foods:

1. Conduct a Hazard Analysis
2. Identify the CCPs
3. Establish critical limits for each CCP
4. Monitor each CCP

¹ See MPR Important Factor VIII

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5. Establish corrective action to be taken when monitoring indicates a deviation from the established critical limit
6. Establish a procedure to verify that the HACCP system is working correctly
7. Establish effective record keeping procedures

Hazard means a biological, chemical, or physical property that may cause a food to be unsafe for consumption.

Risk Based Inspection means an inspection approach focused on identifying significant behaviors and practices inherent to the food service establishment operations with particular emphasis on the Food Code interventions and risk factors.

Risk Control Plan means a mutually agreed upon written plan, between the department and establishment management, that describes a management system for control of foodborne disease risk factors. The plan delineates necessary records, responsible personnel, what needs to be controlled, and how it will be controlled.

Risk Factors means improper practices or procedures, which have been identified by the Centers for Disease Control and Prevention, through epidemiological data as the most prevalent contributing factors of foodborne illness or injury. Risk factors include:

1. Poor personal hygiene
2. Food from unsafe sources
3. Inadequate cooking
4. Improper holding temperatures
5. Contaminated equipment

Standardization means the process whereby the candidate demonstrates knowledge and skills under the Procedures for Field Standardization of Local Health Department Trainers.

Chapter 2 - Pre-Qualification for Standardization

Overview

The field standardization process is intended for local health department candidates who have a significant level of training, along with a considerable amount of experience conducting inspections. The 1999 Food Code supports a comprehensive risk based HACCP approach in concert with traditional inspection techniques. **The procedure is not intended to provide basic training to individuals;** rather it is designed to evaluate and attest that an individual who is well prepared meets a standard of performance in food service inspection. The procedure examines the candidate's knowledge, understanding, and practical application of traditional inspection techniques; Michigan's food code and interpretations, HACCP principles as a risk based food safety evaluation tool, and the ability to work with operators to develop risk control plans.

Eligibility Requirements

The candidate for MDA field standardization is a unique person in the local health jurisdiction who has one or more of the following characteristics:

- a) Conducts inspections on a regular basis
- b) Conducts food safety and/or HACCP training
- c) Is responsible for standardizing inspection personnel
- d) Is responsible for evaluating the department's food service program and makes recommendations for improvement

Candidates who have been reviewed and endorsed by the Environmental Health Director will be considered eligible for field standardization. The Environmental Health Director must submit a copy of the "Standardized Field Trainer Nomination Form" (Appendix B) to MDA to request scheduling of the exercise for the endorsed candidate.

Endorsement Considerations

The candidate for standardization should be a model sanitarian with excellent communication skills whom management would like staff to emulate. The Environmental Health Director should review Chapter 3 of this document with the candidate to determine if the candidate has the skills, experience, and knowledge to pass the MDA standardization process.

Resource Commitment:

The exercise is normally completed within 2 days. The initial fieldwork should provide the MDA representative the information necessary to determine if the candidate is qualified.

Chapter 3 - Field Requirements for Standardization

Overview

Four main elements, each having unique features, shall be successfully completed to pass the standardization process. The elements will be completed by the candidate with minimum guidance and assistance from the MDA representative. The standardization process represents a number of challenges to the candidate. The challenges will focus upon:

- a) Communication skills
- b) Understanding and applying HACCP principles
- c) Correctly applying and interpreting the Michigan Food Law 2000 / 1999 Food Code
- d) Correct use of food service inspection equipment

I. The communication skill element consists of the following components. The candidate will:

- Initiate the inspection with the appropriate introduction of all participants, present credentials and identification, provide an explanation of the purpose of the inspection, describe the benefits to the person in charge, and provide an outline of the overall flow of the visit.
- Conduct a menu review with the person in charge for the purpose of: a) Assessing the knowledge of the person-in-charge. b) Identifying food safety hazards associated with the menu items. c) Understanding the flow of food through the establishment. d) Determining if the critical control points are under control. e) Evaluating standard operating procedures, and f) Assessing employee health and hygiene.
- Conduct an exit interview for the purpose of summarizing the findings of the inspection using a balanced approach that recognizes good practices and focuses upon those risk factors that have a significant impact upon food safety in relation to specific food code violations. He/she will discuss recommended corrective actions and answer any questions of the person in charge or staff.
- Prepare a written inspection report. The report will be prepared using either the standard MDA inspection form or the LHD's approved electronic inspection report writing system. The report will include the appropriate section number of the Food Code, whether or not a violation is critical, a description of the problem, Code requirements, and a summary of the expected corrected condition.
- Assist the operator in the preparation of a written Risk Control Plan that considers the underlying causes of the uncontrolled hazards in order to achieve permanent management solutions.

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II. The HACCP skill element will encompass the following components:

- The candidate shall be familiar with the seven principles of HACCP as defined by the National Advisory Committee on Microbiological Criteria for Foods, and shall be able to demonstrate use of the HACCP principles and risk based inspection techniques during the standardization process.
- While following the establishment's procedures for handling food from delivery through service, the candidate shall determine and document Food Code conformance or violation after significance of the observed condition has been evaluated.

III. The ability to correctly apply and interpret Michigan's Food Law / Food Code and policies element will include the following components:

- Standardization Format: The "FDA Standardization Inspection Report" form will be used to help grade the candidate. A copy is attached to this document. A minimum of four inspections of complex full service operations shall be conducted in accordance with Michigan's Food Law 2000 requirements. The MDA representative will take the lead on the first inspection while the candidate observes. The candidate will take the lead on the next three inspections while the MDA representative observes the interview process and conducts independent inspections. The candidate may choose to apply the inspections towards meeting regulatory inspection frequency requirements or may elect to conduct the inspections for standardization purposes only.
- The candidate will review the menu for the establishment together with the person in charge. The candidate will determine the types of critical processes that are being employed in the establishment (cooking, cooling, cold holding, reheating, hot holding) by asking how the various menu items are prepared and served. The candidate will evaluate the procedures and the person-in-charge's knowledge for handling food safely to determine compliance.
- The candidate will identify the food safety hazards known to be associated with the menu items which are reasonably likely to occur based upon experience, epidemiological data, and information from the technical literature.
- The candidate will make direct observation and ask appropriate questions to the person in charge or kitchen staff to determine if important standard operating procedures are under control in accordance with law. Important standard operating procedures may include:
 - a) The establishment's policies relative to employee health and hygiene
 - b) The establishment's alternative procedures for bare hand contact with ready-to-eat foods.
 - c) The establishment's employee food safety training program.
 - d) Purchasing of foods from approved sources.
 - e) Receiving and storage practices of food and supplies.
 - f) Temperature monitoring of hot/cold food holding equipment.
 - g) Warewashing/Sanitization operation and monitoring.
 - h) Handling of poisonous and toxic materials
 - i) Etc.

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- The candidate will conduct a thorough inspection of the establishment to document significant food code violations. Significant violations are those that clearly demonstrate that a certain practice is not under control. Violations that tend to be the exception to the overall operation are considered to be insignificant and are not to be marked. For example, an establishment having clean utensils stored on the floor, under exposed sewer lines, on dirty surfaces, and under open stairwells, significantly shows that the practice of handling clean utensils is not under control. Conversely, the presence of a few pans that are not stored inverted, while other aspects of handling clean utensils is satisfactory, would be considered to be insignificant. The candidate must exercise good judgement. Violations must be marked correctly on the inspection report form.
- The candidate will answer questions asked by the MDA representative to determine the candidate's competence. The candidate's ability to describe the relationship between the observed violations and their impact upon food safety will be a primary challenge requiring accurate identification and interpretation.
- The candidate will correctly apply the local health department's enforcement policy and submit written documentation to MDA to support the decision and action taken.

IV. The Correct Use of Food Service Inspection Equipment element will include the following:

- To facilitate the required fieldwork by the candidate, specific types of inspection equipment are required to effectively and accurately conduct the inspection. The candidate will be evaluated on their use and understanding of the inspection equipment during the standardization inspections. Experience has shown that specific types of equipment are necessary to effectively conduct inspections and evaluate food safety and food service operations. The following is a list of minimum equipment recommended to evaluate a food service operation:
 - a. Necessary inspection forms (or computer) and administrative materials.
 - b. Head cover: baseball cap, hair net, or equivalent.
 - c. Temperature measuring device for food and ambient air (thermocouple or thermistor preferred).
 - d. Maximum registering thermometer or temperature sensitive tapes for verifying hot water warewasher final rinse temperatures.
 - e. Chemical test kits for different chemical sanitizers.
 - f. Flashlight.
 - g. Alcohol swabs.

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Standardization – Pass/Fail

The MDA representative will make an objective evaluation of the candidate's communication skills, knowledge of HACCP principles, knowledge of the Michigan Food Law 2000 / 1999 Food Code and policies, and the correct use of food service inspection equipment. Candidates must have a 90% level of agreement in the "Food Illness Interventions and Risk Factors" section of the "FDA Standardization Inspection Report" with the MDA consultant. The candidate must also demonstrate significant knowledge and good judgement. A certificate will be issued to successful candidates. MDA will prepare a report defining specific skill areas in need of improvement for those who do not pass.

Chapter 4

Procedures for Re-Evaluation Of Local Health Department Standardized Field Trainers

Field Standardization Cycle: Upon successful completion of the standardization process to the satisfaction of the MDA representative, the title of “Standardized Field Trainer” shall be awarded to the candidate for a period of three years.

Every three years, MDA staff will re-evaluate local health department standardized field trainers. The procedure will have two areas of focus:

1. Required Maintenance Activities

A standardized trainer is expected to apply the techniques by routinely conducting one or more of the following activities:

- Field and/or classroom employee training exercises in accordance with this document
- Routine risk-based inspections in accordance with this document
- Food service sanitation program evaluations to assure the implementation of the risk based inspection process

Evaluation

MDA will determine if the candidate routinely applies the techniques by:

- Interviewing new employees to determine if they are being taught the risk-based inspection procedures according to this document.
- Asking the candidate to produce examples of inspection reports and Risk Control Plans that he/she has completed.
- Asking the candidate to produce records of program quality assurance reviews that focus attention to the risk based inspection process and the use of Risk Control Plans.

2. Current Performance to Conduct Inspections as a Standardized Trainer

Two inspections will be conducted by the standardized trainer with an MDA representative in accordance with the “Procedures for Field Standardization of Local Health Department Trainers”.

Chapter 5

Certificate Suspension or Revocation

Expiration: A certificate shall expire 3 years from the date of issuance.

Suspension or Revocation: The Michigan Department of Agriculture may suspend or revoke a certificate mid-term for the following reasons:

- Failure to maintain eligibility requirements
- Failure to perform the required maintenance activities
- Recommendation for suspension or revocation is received from the environmental health director.
- Substantiated evidence is received through the accreditation process, complaints, or other sources to indicate that the standardized trainer lacks the competence required to hold the certificate.

Procedure for Suspension or Revocation

MDA shall notify the certificate holder in writing of the reasons for the intent to suspend or revoke a certificate and offer the opportunity for a conference to hear the reasons for the intended action. The certificate holder may either respond in writing or request an administrative conference to be scheduled.

Responses in Writing

- All responses in writing shall be directed to the manager of the Food Service Sanitation Program Section.
- All responses must be submitted within 30 days upon receipt of the reasons of intent to suspend or revoke the certificate. If written response is not made within 30 days, the intended action becomes final.

Administrative Conference

- A request for an administrative conference must be made within 30 days upon receipt of the reasons of intent to suspend or revoke the certificate. If a request for an administrative conference is not made within 30 days, the intended action becomes final.
- If a conference is requested, the conference shall be conducted by the manager of the Food Service Sanitation Program Section and be scheduled within 30 days upon the receipt of the request.
- At the conference, the certificate holder may present arguments, including documents and/or witnesses, in order to testify why MDA should not suspend or revoke the certificate.
- At the conference, MDA representatives may present witnesses or other evidence to justify the intended action.

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Disposition

Upon review of the testimony and evidence, the manager of the Food Service Sanitation Section shall decide to either:

- Take no action.
- Send a warning letter to the certificate holder.
- Temporarily suspend the certificate with notice regarding the conditions for reinstatement; or
- Revoke the certificate.

MDA shall notify both the certificate holder and the local health department of the decision.

Appeal and Final Disposition

- A certificate holder may appeal a decision, in writing, to the Director of MDA Food and Dairy Division within 30 days. If a request for an appeal is not made, the decision of the manager of the Food Service Sanitation Section manager is final.
- The decision of the Director of the Food and Dairy Division is final.

Reinstatement of Suspended or Revoked Certificate

A person who has a suspended or revoked certificate may apply for re-instatement of the certificate in accordance with the following:

- Submit a request, in writing, to the manager of the Food Service Sanitation Section to reinstate the certificate along with documentation to verify that the reasons for suspension or revocation have been corrected.
- Submit a letter from the environmental health director that indicates a review of the candidate's performance and eligibility requirements has been made and the candidate is again qualified to hold the certificate.
- Successfully complete the Procedures for "Field Standardization of Local Health Department Trainers" with the MDA representative.

<p style="text-align: center;">APPENDIX A RECOMMENDED CHANGE FORM</p>

The following changes are recommended to the Procedures for Field Standardization of Local Health Department Trainers Personnel document administered by the MDA:

ISSUE OF CONCERN: _____

SPECIFIC SECTION OF PROCEDURE FOR CHANGE: _____

EXPLAIN WHAT CURRENT SECTION OF PROCEDURE DOES NOT ACCOMPLISH AND WHY LANGUAGE IN SECTION SHOULD BE CHANGED:

RECOMMENDED LANGUAGE FOR CONSIDERATION: _____

Name of Submitter: _____ Date: _____

APPENDIX B
STANDARDIZED FIELD TRAINER NOMINATION FORM

TO: MDA Food Service sanitation Section

FROM: (Applicant's Supervisor)

SUBJECT: REQUEST FOR MDA FIELD STANDARDIZATION

SECTION 1
APPLICANT INFORMATION

NAME: _____

TITLE: _____

AGENCY: _____

OFFICE TELEPHONE NUMBER: _____

ADDRESS: _____

I have reviewed the eligibility requirements in Chapter 2 of "Procedures for Field Standardization of Local Health Department Trainers" and consider
_____ qualified for participation in the MDA
Standardization procedure.

(Environmental Health Director signature)

(date)